

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
NEWNAN DIVISION

IN RE:)
)
JOHN RONALD LONG) CHAPTER 13
) CASE NO.: 21-10273-LRC
)
)
DEBTOR.)

**CHAPTER 13 TRUSTEE'S
SUPPLEMENTAL OBJECTION TO CONFIRMATION & MOTION TO DISMISS**

Melissa J. Davey, Chapter 13 Trustee, objects to confirmation of the plan and moves to dismiss this case pursuant to 11 U.S.C. Section 1307(c) for the following reasons:

1. The Chapter 13 Plan fails to provide treatment of the filed secured claim of Newnan Crossing Homeowners Association in violation of 11 U.S.C. Sections 1322(a)(2) or 1325(a)(5).

Wherefore, the Trustee moves this Honorable Court to consider the above objections at the confirmation hearing, deny confirmation of the Chapter 13 plan, dismiss the case pursuant to 11 U.S.C. Section 1307(c), and for such other and further relief that this Court deems just and proper.

Dated: July 13, 2021

/s/Kelsey A. Makeever

Kelsey A. Makeever

Attorney for the Chapter 13 Trustee

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CERTIFICATE OF SERVICE

This is to certify that I have on this day electronically filed the foregoing Chapter 13 Trustee's Supplemental Objection to Confirmation & Motion to Dismiss using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of this document and an accompanying link to this document to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program:

Victoria E. Baggett Victoria@nowackhoward.com, bankruptcy@nowackhoward.com
Melissa J. Davey cdsmary@13trusteeatlanta.com, cdbackup@13trusteeatlanta.com
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I further certify that on this day I caused a copy of this document to be served via United States First Class Mail on the following parties at the address shown for each:

DEBTOR(S):
JOHN RONALD LONG
80 CREEKSIDE WAY
NEWNAN, GA 30265-6064
Dated: July 13, 2021

/s/Kelsey A. Makeever
Kelsey A. Makeever
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